

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**In re:** : Case No.: 25-10990  
Sherryce Valentine : Chapter 13  
Debtor(s) : Judge Derek J. Baker  
\*\*\*\*\*  
Sherryce Valentine : Date and Time of Hearing  
Kenneth E. West : \_\_\_\_\_  
Movant, : Related Document No. 8  
vs :  
Union Home Mortgage Corp. :  
Respondents. :

**OBJECTION OF UNION HOME MORTGAGE CORP. TO THE CONFIRMATION OF  
THE PLAN (DOCKET NUMBER 8)**

Union Home Mortgage Corp. ("Creditor") by and through its undersigned counsel, objects to the confirmation of the currently proposed plan ("Plan") filed by Sherryce Valentine ("Debtor") as follows:

1. Creditor holds a security interest secured by a mortgage lien on Debtor's property commonly known as 7834 Forrest Ave, Philadelphia, PA 19150-2106 ("Property").
  2. Creditor filed a Proof of Claim in the amount of \$88,135.08. This amount includes a pre-petition arrearage in the amount of \$1,750.18.
  3. Debtor's Plan does not provide for the arrearage due on Creditor's claim.
  4. Debtor's Plan represents an impermissible modification of Creditor's claim and a violation of 11 U.S.C. §§1322 and 1325.

WHEREFORE, Creditor respectfully requests that the Court deny the confirmation of the Debtor's currently proposed Plan.

Respectfully submitted,

/s/Stephen R. Franks  
\_\_\_\_\_  
Stephen R. Franks, Esquire (333394)  
Adam B. Hall (323867)  
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Attorneys for Creditor  
The case attorney for this file is Stephen R.  
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## **CERTIFICATE OF SERVICE**

I certify that on the date of filing, a copy of the foregoing Objection of Union Home Mortgage Corp. to the Confirmation of the Original Plan was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

Kenneth E. West, Chapter 13 Trustee, [ecfemails@ph13trustee.com](mailto:ecfemails@ph13trustee.com)

Michael A. Cibik, Attorney for Sherryce Valentine, [help@cibiklaw.com](mailto:help@cibiklaw.com)

I certify that on

ail to the following:

Sherryce Valentine